### **BAKER & HOSTETLER LLP**

45 Rockefeller Plaza New York, NY 10111

Telephone: (212) 589-4200 Facsimile: (212) 589-4201

David J. Sheehan Nicholas J. Cremona Christa C. Turner

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff

# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

THEODORE STORY, individually and in his capacity as joint tenant, and CYNTHIA STORY, individually and in her capacity as joint tenant,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05431 (SMB)

### SECOND AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (BRL), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. The Initial Disclosures were exchanged on: April 14, 2014.
- 2. Fact Discovery shall be completed by: June 25, 2015.
- 3. The Disclosure of Case-in-Chief Experts shall be due: August 25, 2015.
- 4. The Disclosure of Rebuttal Experts shall be due: September 25, 2015.
- 5. The Deadline for Completion of Expert Discovery shall be: December 22, 2015.
- 6. The Deadline to file a Notice of Mediation Referral shall be: January 5, 2016.
- 7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: January 19, 2016.
- 8. The Deadline for Conclusion of Mediation shall be: May 18, 2016.

Dated: March 6, 2015

### **BAKER & HOSTETLER LLP**

By: /s/ Nicholas J. Cremona\_

45 Rockefeller Plaza New York, New York 10111 Telephone: 212.589.4200 Facsimile: 212.589.4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Nicholas J. Cremona

Email: ncremona@bakerlaw.com

Christa C. Turner

Email: cturner@bakerlaw.com

Attorneys for Plaintiff Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff

# GOLENBOCK EISEMAN ASSOR BELL & PESKOE LLP

By: /s/ Jonathan L. Flaxer 437 Madison Avenue New York, New York 10022 Telephone: 212.907.7327 Jonathan L. Flaxer

Email: jflaxer@golenbock.com

Michael S. Weinstein

Email: mweinstein@golenbock.com

Attorneys for Defendants